

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Brandon Edwards, a Special Agent with Homeland Security Investigations, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. Your affiant has been a Special Agent (SA) with Homeland Security Investigations (HSI) since 2019. As an HSI Special Agent, your affiant completed the Federal Criminal Investigator Training Program and the HSI Special Agent Training Academy in August 2020. During CITP and the HSI Academy training, your affiant was instructed in all phases of criminal investigations such as: Criminal Law, Search and Seizure, Investigative Techniques, Firearms Proficiency, and Evidence Handling. Your affiant has led and participated in numerous investigations of crimes involving drug smuggling, firearms trafficking, immigration, and other violations. Prior to working with HSI, your affiant was a SA with the National Security Agency in Maryland and an employee of the Federal Bureau of Investigation in the Denver, Colorado Field Office.

2. Your affiant has been the case agent on multiple contraband smuggling investigations to include firearms trafficking and narcotics smuggling. Your affiant is experienced with conducting surveillance, serving as the control agent for confidential sources, and investigating violations of the Immigration and Nationality Act (INA).

3. This affidavit is being submitted for the purpose of establishing probable cause that:

- a. **Mario Gamino SANCHEZ (“SANCHEZ”),** and
- b. **Laura REYES Esquivel (“REYES”)**

have violated 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(ii), and 18 U.S.C. § 2 (Possession with Intent to Distribute over 500 grams of Cocaine, Aiding and Abetting), 18 U.S.C. §§ 924(c) (Possession of a Firearm in Furtherance of a Drug Trafficking Crime), and 18 U.S.C. § 922(g)(5), (Prohibited Possession of a Firearm by an Alien).

4. The information in this affidavit is based on my personal knowledge, information provided by other law enforcement officers and individuals, and the reports and memoranda of other law enforcement officers. The information in this affidavit is provided for the limited of establishing probable cause in connection with this application for a criminal complaint and an arrest warrant. This affidavit does not include all the information gathered during this investigation. The following information is based on my personal knowledge, the knowledge of other agents and officers, as well as investigations conducted by other law enforcement entities.

PROBABLE CAUSE – DRUG TRAFFICKING AND FIREARM VIOLATION

5. In the fall of 2024, HSI Columbus, along with the Central Ohio Drug Enforcement Task Force (CODE), were contacted by a confidential informant (CI) that has provided information to law enforcement in the past that led to multiple arrests and seizures. Based on independent corroboration of the CI's information, your affiant believes the CI to be reliable and credible. The CI advised that a subject, only known to the CI by the name "Mario," had contacted him/her regarding the purchase of cocaine.

6. Using law enforcement databases, investigators identified "Mario" as Mario GAMINO-Sanchez and were able to identify his residence located at 1730 Birchcreek Lane, Columbus, Ohio. A photo of GAMINO was shown to the CI and his identity was confirmed.

7. On February 11, 2025, investigators were conducting physical surveillance of the Birchcreek residence. At approximately 6:09 a.m., a male who appeared to be GAMINO, exited

the residence and entered the driver's seat of a silver Chevy Tahoe that was parked in front before the GAMINO then drove away.

8. Approximately five (5) minutes later, an unidentified female, later identified as Laura REYES Esquivel exited the Birchcreek residence and entered the driver's seat of a red Range Rover ("Range Rover") with Ohio license plate: JAB9313, before driving away.

9. In May of 2025, GAMINO reached out to the CI stating that he wanted to sell approximately two (2) kilograms of cocaine to an HSI undercover agent that had previously been introduced to the CI in the winter of 2024. On about June 1, 2025, at the direction of HSI, the CI communicated with GAMINO and agreed to purchase two (2) kilograms of cocaine for \$70,000 at a set location in the Southern District of Ohio in the following days.

10. On June 4, 2025, at approximately 5:30 a.m., investigators began physical surveillance of the Birchcreek residence, in anticipation of the controlled purchase. Within the hour, investigators observed GAMINO and REYES exiting the residence through the front door. GAMINO got into the front passenger seat of the Range Rover. REYES was carrying a pink purse and appeared to open the hatch of the vehicle and move something around. REYES then shut the hatch, still carrying the same purse, entered the driver's seat, and drove away, as investigators maintained constant physical surveillance of the vehicle.

11. At approximately 6:45 a.m., Licking County Sheriff's Deputy Chris Hamacher observed the Range Rover driving eastbound on U.S. Route 40. Deputy Hamacher conducted a traffic stop on the vehicle. The passenger was identified as GAMINO and the driver was identified as REYES. During the course of the stop, "Slaine" - a certified narcotics canine from Licking County Sheriff's Office, positively alerted to the odor of narcotics in the vehicle. Investigators searched the vehicle and located two (2) bricks of white powder wrapped in plastic,

placed inside a pink purse in the back seat of the vehicle – the same pink purse that investigators observed REYES carrying into the vehicle earlier that morning. Investigators conducted a field test on the powdery substance and it presumptively tested positive for cocaine with a total weight (packaging included) of approximately 2.29 kilograms. A black Beretta 92 FS .9mm handgun with serial number BER239839Z was found inside the glovebox vehicle with a loaded magazine of seven (7) .9mm rounds. No round was in the chamber of the firearm. Based on my experience and training, I am aware that the quantity of cocaine recovered is a distribution quantity and that drug traffickers commonly carry firearms for protection of their drugs as well as their drug proceeds. GAMINO and REYES were then transported to the ICE Columbus, Ohio office for interviewing.

12. A review of Department of Homeland Security (DHS) records indicates that both REYES and GAMINO are citizens of Mexico and neither lawfully entered the United States prior to their arrest. According to the records, REYES has twice voluntarily returned to Mexico after being found illegally in the United States. Both REYES and GAMINO admitted to being unlawfully present in the United States.

13. Reviewing online resources, your affiant is also aware that Beretta firearms are manufactured in the United States, but not in the state of Ohio and would necessarily have traveled in interstate commerce.

CONCLUSION

13. Based on the foregoing, I submit that there is probable cause to believe that on or about the above date, in the Southern District of Ohio, GAMINO AND REYES

- a. knowingly and intentionally possessed with the intent to distribute and distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine,

- a Schedule II controlled substance, in violation of Title 21, United States Code § 841(a)(1) and (b)(1)(A)(ii); and
- b. possessed a firearm in furtherance of a drug trafficking crime for which each may be prosecuted in a court of the United States, in violation of Title 18, United States Code § 924(c); and
- c. knowing that they were an alien illegally and unlawfully in the United States, did each knowingly possess a firearm, said firearm having previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, U.S.C. § 922(g)(5) and 924(a)(2).


Respectfully submitted,

**BRANDON G
EDWARDS**

Digitally signed by BRANDON G
EDWARDS
Date: 2025.06.04 11:27:30 -04'00'

Brandon Edwards
Special Agent
Homeland Security Investigations

Sworn and subscribed to before me this 4th day of June, 2025.



CHELSEY M. VASCURA
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF OHIO